

THE ROSEN LAW FIRM, P.A.

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[Proposed] Lead Counsel for Lead Plaintiff and Class

Additional Counsel on Signature Page

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SLATER BRENNAN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LATCH, INC. f/k/a TS INNOVATION
ACQUISITIONS CORP., LUKE
SCHOENFELDER, GARTH MITCHELL, and
BARRY SCHAEFFER,

Defendants.

CASE No.: 1:22-cv-07473-JGK

**NOTICE OF NON-OPPOSITION
TO THE MOTION OF VB PTC
ESTABLISHMENT AS TRUSTEE
OF GERSEC TRUST TO: (1)
APPOINT LEAD PLAINTIFF; AND
(2) APPROVE LEAD PLAINTIFF'S
SELECTION OF COUNSEL
(DKT. NO. 18)**

CLASS ACTION

Movant VB PTC Establishment as Trustee of Gersec Trust ("Movant" or "VB PTC Establishment") respectfully submits this Notice of Non-Opposition to its Motion to: (1) Appoint Lead Plaintiff; and (2) Approve Lead Plaintiff's Selection of Counsel, filed on October 31, 2022. (Dkt. No. 18).

Four competing motions were filed in this action by: (i) Alan Bishop (Dkt. No. 9); (ii) the Latch Investor Group, comprised of Stephen Lind, Adam Gotterer, and Joseph Jackino (Dkt. No.

13); (iii) Kenneth Grutman (Dkt. No. 16); and (iv) Elizabeth Torres (Dkt. No. 23). Each of the competing movants filed notices of non-opposition conceding that they did not have the largest financial interest as contemplated under the Private Securities Litigation Reform Act of 1995 (“PSLRA”) (Dkt. Nos. 28, 29, 30, 31).¹

The November 14, 2022 deadline to file any opposition has passed and no opposition to VB PTC Establishment’s motion was filed. Accordingly, Movant’s motion is unopposed. Thus, VB PTC Establishment respectfully requests that the Court: (1) appoint Movant as Lead Plaintiff of the Class; and (2) approve Movant’s selection of The Rosen Law Firm, P.A. as Lead Counsel. The [Proposed] Order Appointing Lead Plaintiff and Approving Lead Plaintiff’s Selection of Counsel, filed as docket number 21, reflects these requests.

Dated: November 15, 2022

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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*[Proposed] Lead Counsel for Lead Plaintiff
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THE SCHALL LAW FIRM

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¹ Mr. Grutman and the Latch Investor Group both recognized that VB PTC Establishment has the largest financial interest pursuant to the PSLRA.

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2022, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim